

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**THOMAS R. RODELLA and  
THOMAS R. RODELLA, JR.**

**Defendant.**

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**Case No.: 14-CR-2783 JB**

**JOINT MOTION FOR CONTINUANCE OF  
THE TRIAL SETTING OF SEPTEMBER 15, 2014**

Defendant Thomas R. Rodella, by and through his counsel of record, Robert J. Gorence and Louren Oliveros of Gorence & Oliveros, P.C., and Defendant Thomas R. Rodella, Jr., by and through his counsel of record, Jason Bowles of the Bowles Law Firm, hereby respectfully request the Court to vacate the Trial setting of September 15, 2014, for a period of one week to September 22, 2014. As grounds for this Motion, the Defendants state as follows:

1. After Defendants' request for a speedy trial [Doc. 19], this matter was set for a jury trial on September 15, 2014

2. During the August 25, 2014 status conference, it was determined that the time for filing motions, designation of experts and hearing of motions would be problematic to complete if the trial were to commence on September 15, 2014. Accordingly, the parties requested a one week continuance of the trial setting.

3. The parties have agreed to internal deadlines related to motions practice and the exchange of witness and exhibit lists and jury instructions.

4. The parties agree that the time period of the extension shall be excluded in computing time within which the trial must commence pursuant to 18 U.S.C. §3161(h)(1)(H), and

18 U.S.C. §3161(h)(7)(A). The parties further state that the above-stated grounds for this request serve the ends of justice and outweigh the best interest of the public and the Defendants in a speedy trial.

5. The government, through its counsel, AUSA Tara Neda, concurs in this motion.

WHEREFORE, the Defendants hereby respectfully request the Court to vacate the Trial setting of September 15, 2014, and that it be reset within one week from the current trial setting on September 22, 2014.

Respectfully submitted,

/s/ Robert J. Gorence

Robert J. Gorence

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*Attorney for Defendant Thomas R. Rodella, Jr.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 26<sup>th</sup> day of August, 2014, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Tara C. Neda, Assistant U.S. Attorney  
([tara.neda@usdoj.gov](mailto:tara.neda@usdoj.gov))

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s/ Robert J. Gorence  
Robert J. Gorence